



## Minnesota Pollution Control Agency

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September 2, 2008

John Bunyak  
Air Resources Division  
National Park Service  
P.O. Box 25287  
Denver, Colorado 80225

Dear Mr. Bunyak:

The Minnesota Pollution Control Agency appreciates the opportunity to comment on the revised FLAG Phase I Report.

First, we believe that increasing harmonization of the FLAG guidance with the Regional Haze program is advantageous. In particular, we agree that adopting criteria from the Best Available Retrofit Technology (BART) guidance, so that these two programs are more similar in their individual source modeling, is a beneficial change. Offering clearer "off-ramps" for facilities with minimal impacts to avoid Prevention of Significant Deterioration Program (PSD) Class I analyses, such as the  $Q/D \leq 10$  screening mechanism, provides efficiency for facilities and regulated parties without endangering environmental protection. Finally, the revised guidance seems much more user-friendly.

One concern that we have is in the section on "Emissions Input," page 35-36 of the draft document. The document states that "Applicants should calculate the 24-hour average net emission increase for each pollutant from modified facilities as the maximum allowable 24-hour average minus the actual hourly rate averaged over the past two years (annual emissions over past two years/hours of operation over last two years). We suggest that, rather than two years, the guidance allow averaging over a range of two to five years. There are circumstances where a five year average provides a better picture of a facility's range in operation, and therefore, it would be useful to use such a longer average.

Sincerely,

Todd J. Biewen, Manager  
Air Assessment and Environmental Data Management Section  
Environmental Analysis and Outcomes Division  
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